

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

|                                          |   |                                              |
|------------------------------------------|---|----------------------------------------------|
| IN RE SONUS NETWORKS, INC.<br>LITIGATION | ) | Civil Action No. 04-10294-DPW                |
|                                          | ) | (Lead Case)                                  |
|                                          | ) |                                              |
|                                          | ) |                                              |
|                                          | ) | <b>LEAD PLAINTIFF'S UNOPPOSED</b>            |
|                                          | ) | <b>MOTION FOR EXTENSION OF TIME</b>          |
| THIS DOCUMENT RELATES TO:                | ) | <b>TO FILE PAPERS IN OPPOSITION TO</b>       |
| ALL CASES                                | ) | <b><u>DEFENDANTS' MOTIONS TO DISMISS</u></b> |
|                                          | ) |                                              |
|                                          | ) |                                              |
|                                          | ) |                                              |

Pursuant to Rule 6(b)(1), Fed.R.Civ.P. and LR, D. Mass. 7.1, Lead Plaintiff BPI Global Asset Management LLP hereby moves for an extension of time, to and including March 22, 2005, to file papers in opposition to the motions to dismiss filed by defendants Sonus Networks, Inc., Hassan Ahmed, and Stephen J. Nill. Defendants do not oppose this request. Declaration of Solomon B. Cera ("Cera Decl."), filed herewith, ¶2. Contemporaneous with the filing of their motions to dismiss, defendants lodged a Joint Scheduling Proposal, reflecting the parties' request for an order approving March 22, 2005 for opposition briefs and April 21, 2005 for reply briefs on the pending motions. *Id.* Good cause exists for these requested extensions.<sup>1</sup>

The Consolidated Amended Complaint was filed December 1, 2004. By its January 18,

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<sup>1/</sup> On February 8, 2005 Lead Plaintiff's counsel made an inquiry of the Courtroom Clerk as to the status of the Joint Scheduling Proposal, lodged January 28, 2005. Counsel received an e-mail response from the Courtroom Clerk stating that the proposal would be adopted as an order of the Court. Cera Decl. ¶3. Because no order has been received as of this date (the due date for opposition briefs under LR, D. Mass. 7.1(b)(2)), Lead Plaintiff submits this application in an abundance of caution.

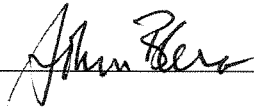
2005 Order the Court granted defendants' request to extend their time to respond to the Consolidated Amended Complaint. On January 28, 2005, each of the defendants filed a motion to dismiss and supporting papers reflecting lengthy and complex arguments. Lead Plaintiff and defendants conferred about an appropriate briefing schedule on the motions, and agreed on the scheduled reflected in the Joint Scheduling Proposal. Cera Decl. ¶2.

Lead Plaintiff's counsel is working diligently and in good faith to prepare oppositions to defendants' motions to dismiss. *Id.* ¶4. Lead Plaintiff will not seek any further extensions to file opposition papers beyond March 22, 2005. *Id.*

Accordingly, Lead Plaintiff requests that the Court extend the time for the filing of its papers in opposition to defendants' motions to dismiss to and including March 22, 2005.

Dated: February 11, 2005

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By 

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